

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

W. A. DREW EDMONDSON, in his)
capacity as ATTORNEY GENERAL)
OF THE STATE OF OKLAHOMA and)
OKLAHOMA SECRETARY OF THE)
ENVIRONMENT C. MILES TOLBERT,)
in his capacity as the)
TRUSTEE FOR NATURAL RESOURCES)
FOR THE STATE OF OKLAHOMA,)
Plaintiff,)
vs.) 4:05-CV-00329-TCK-SAJ
TYSON FOODS, INC., et al,)
Defendants.)

THE DEPOSITION OF BOBBY

WILLIAMS, produced as a witness on behalf of the
Plaintiff in the above styled and numbered cause,
taken on the 13th day of November, 2007, in the City
of Tulsa, County of Tulsa, State of Oklahoma, before
me, Lisa A. Steinmeyer, a Certified Shorthand
Reporter, duly certified under and by virtue of the
laws of the State of Oklahoma.

Exhibit 40

TULSA FREELANCE REPORTERS
918-587-2878

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1 A Right.

2 MS. THOMPSON: Object to the form.

3 Q When you operated for the Cargill integrator,
4 did you have a written contract?

5 A Yes, should have, best I remember. 11:14AM

6 Q Okay. Did you have written contracts with
7 Hudson?

8 A I suppose so. I can't remember all the
9 details. That's been too long ago, but you
10 basically have to have a contract to grow. 11:15AM

11 Q When you have one of those contracts, are you
12 allowed to negotiate any of the terms of those
13 contracts with the integrator?

14 A Not that I know of.

15 Q Did Cargill supply you a flock supervisor when 11:15AM
16 you were growing for Cargill?

17 A The field man, is that what --

18 Q Yes, sir.

19 A Yes.

20 Q And how often would he come around? 11:15AM

21 A Usually once a week.

22 Q Is that the same for Hudson and for Tyson; did
23 you have the same kind of operation with them?

24 A Yes.

25 Q Did Cargill have any rules regarding how and 11:15AM

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1 when you would clean out your poultry barns when you
2 operated it for them?

3 A Usually they required you clean out once a
4 year.

5 Q Were those rules any different with Hudson or 11:15AM
6 Tyson?

7 A No.

8 Q Do you know whether Cargill knew generally
9 what you did with the poultry waste when you removed
10 it from the barns? 11:16AM

11 MS. SOUTHERLAND: Object to the form.

12 A I don't really know because they never did
13 ask.

14 Q All right. Did you ever tell the flock
15 supervisor or the field man what you were doing with 11:16AM
16 the poultry waste?

17 A No.

18 Q Did they ever observe you cleaning out your
19 barns?

20 A No. 11:16AM

21 Q How many tons would you pull out of your barns
22 each time you would do a clean-out?

23 A I don't rightly know. I never did weigh it.

24 Q Did you count the loads you would pull out?

25 A Well, when I cleaned out, back then I just had 11:16AM

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